3 May 1976

MEMORANDUM FOR: Deputy Director of Personnel for Plans and Control

STATINTL FROM   :

Chief, Control Division

SUBJECT   : Review and Comments Concerning Recommendations
                  of IG Survey of OP

1. The portion of the issue-oriented OP survey recently conducted by
Inspectors of the Office of the Inspector General dealing with the investi-
gation of employee personnel records and management information has been
reviewed. Suggestions and comments pertinent to the recommendations and
observations cited by the Inspectors follow:

A. Recommendation No. 1. (Tab A page A-12) That the Director
of Personnel implement a means by which the condition of active
Official Personnel Folders can be assessed in terms of the presence
of misfiled or unauthorized documents and the absence of documents
that should be included. If widespread serious inadequacies are
found to exist, review and correction of all active folders should
be undertaken.

Comment: (Tab A--Page A-9 para 17 thru para 20 page A-12)
Some papers are included in the wrong folders and some folders con-
tain unnecessary duplicate copies of material and even useless paper.
Many of the errors are corrected through periodic reviews of the
Official Personnel Folder (OPF) within the Office of Personnel. All
assigned personnel of the Central File Room (CFR) including "Summer
Only" employees are indoctrinated with and instructed in the impor-
tance of accurate (and timely) filing. Our Biographic and Qualifi-
cations Analysts of QAB in the course of their daily duties tag mis-
filed or questionable material for review and corrective action by
the CFR, if required, before the OPF is returned to the files. Com-
ponent personnel officers, too, have been admonished of their respon-
sibility to bring to the attention of CFR personnel findings of mis-
filings, and to preclude the adding to or deletion of material from
the OPF by unauthorized personnel. These actions are reasonable precau-
tions but, inevitably errors occur in filing the large volume of
material to be placed in the OPF. The problem has long been with us,
and I am certain any kind or size of sampling will so reflect. How-
ever, I do not believe the inadequacies occasioned by misfilings,

incomplete filings, etc., constitute legal or career-damaging problems. The OPF is not the only source (or perhaps, not the primary source) of information used in employee evaluations or entitlement determinations.

Obviously, where inadequacies appear efforts should be made to correct them. No issue, therefore, is taken with the concept of Recommendation No. 1, but the suggestion of the Inspectors that employees review their "soft" component file along with the OPF to discern errors of filing omission or commission gives me reason for concern. In my opinion, such comparison will produce only more confusion about the documentation included in each file, and I venture to predict unsatisfactory results and the creation of more problems. I am not in favor of using the "soft" file and suggest for purposes of Recommendation No. 1 that the OPF only be examined by the employee. To aid the employee in the review he should be furnished an information sheet which shows what documentation is generally placed in the OPF in accordance with current policy. In conjunction with the review the employee will be requested to complete a form which shows his findings of misfilings, duplications, questionable or missing data, any remarks or explanations desired. The information provided by the employee will be analyzed by a personnel officer and action taken as appropriate.

To obtain a sampling in conformance with Recommendation No. 1, the above procedure could be followed by designated component personnel officers randomly selecting 30 employees from the office they represent to review their OPF and complete a form which identifies errors found in the OPF. The component personnel officer would verify the errors or remarks noted, search for missing material, bring to the attention of Chief, TRB, any material to be added to or deleted from the OPF, and inform the employee of the action taken. Additionally, the component personnel officer will compile a statistical report of the total sample group finds and forward it to the Director of Personnel for information, analyses, and determination of future action.

It is further proposed that the above procedure be adopted and applied by SPD/OP personnel officers in association with the file review program available to employees.

In March 1975 the CFR instituted selected hours of operations for authorized personnel to obtain OPF's. This action in addition to the employment in January 1976 of two (2) WAE contract employees

enables CFR employees more time to file documents and keep the
OPF up-to-date. There is about a one-week lag time in filing
under the present system. This time is necessary to allow al-
phabetizing and group sorting of the material and the prepara-
tion of statistical counts. All filing received in a current
week is filed the following week. With continued use of the
WAE contract employees we anticipate the capability to meet the
requirement for timely filing of priority and essential material
in the OPF.

B. <u>Recommendation No. 2. (Tab A--page A-15) That the Director
of Personnel assume custody and responsibility for all Official
Personnel Records on contract employees.</u>

Comment: (Tab A--page A-13 para 24 thru para 26 page A-14)
Establishing the contract employee file holdings in the Contract
Personnel Division of the Office of Personnel as the official file
of record appears to be a proper and appropriate management approach.
I leave to Chief, Contract Personnel Division the chore of presenting
substantive reasons for or against Recommendation No. 2. In the
event there is consideration of consolidating the locations of con-
tract employee files with the staff files, I point out that there is
insufficient space in the present CFR location to accommodate such a
merger, and the existing manpower resources of the CFR are not ade-
quate to maintain the combined files.

C. Narrative Areas

(1) Reference to Chief, TRB continual problem of monitoring
errors.

Comment: (Tab B--page B-5 para 9) Chief, TRB in discussion
with the Inspectors was referring to errors in the preparation of
transcripts in TRB and requests for personnel actions prepared and
submitted by Agency components to Position Control Section/TRB.
Actions to remedy the problem areas cited by the Inspectors were un-
der consideration and in process before the IG Team interview. Speci-
fically, a new deputy to Chief, TRB is in place, and is demonstrating
thoroughness and competence in performance of duties, including con-
structive supervision and instruction to subordinate employees in
research techniques. As a result, transcript production and accuracy
have improved greatly. A reduction of errors in requests for personnel
actions is being accomplished by contacting personnel of the offices
making the errors and conducting training sessions with them.

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(2)   Inspectors reference to "cast-offs" in TRB.

Comment: (Tab B--page B-6 para 10)   The Inspectors made reference to some TRB clerks being "cast-offs" from other offices. I believe the Inspectors misinterpreted Chief, TRB's remarks to them about the practice of TRB to accept and utilize personnel from other offices of the Agency who are temporarily placed in the CFR pending assignment.

(3)   Biographic Profiles and Qualifications Files.

Comment: (Tab B--page B-7 paras 12 and 13; page B-8 paras 14 and 15) (Tab B--page B-8 para 16; page B-9 paras 17 and 18; page B-10 para 19).   In general the Inspectors justly described the utilization and status of the Biographic Profile and Qualifications File Sections of QAB.   I am pleased with their observations: a) that despite customer criticism about profiles the service is found useful; and, b) the "skill" capability be maintained.   There are, however, two (2) inaccuracies concerning the Qualifications Files.   One states, "The file is maintained in accordance with criteria established by the Civil Service Commission." (para 16 page B-9 and para 18 page B-10).   The statement is incorrect.   The Qualifications System was not developed to meet CSC criteria, but exclusively to meet Agency needs, current and future.   The second inaccuracy concerns Project CENQUAL and states, "This program is a subsidiary of PERSIGN II." (para 19 page B-10).   CENQUAL will interface with PERSIGN II but is not a part of it, and our request to OJCS for the CENQUAL program specifically indicated that its completion was in no way to delay or remove resources required to complete PERSIGN II.

The qualifications coding is being accomplished at present on a 10/11 month cycle for all but the DDO which has a 15/16 month cycle attributed to the assignment of a new coding analyst to the task.   In June 1975 a Headquarters Notice was published calling attention to the Agency Personnel Qualifications Records System, and it has brought more requests for its application.   It is planned to re-issue the publication in June of 1976.

2.   The recognition by the Inspectors of the multiple complexities and difficulties encountered and involved in the operation of our personnel record systems is, indeed, appreciated, and the fact they were very favorably impressed with the abilities, attitudes, and accomplishment of the people

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working at these tasks. Given the inevitability of the shortcomings which develop and surface because of the systems and our methods of operating within them in no way, of course, excuses the continuation or creation of faults. I am most satisfied that the section and branch chiefs and all employees of Control Division are sufficiently knowledgeable of the duties and responsibilities to be carried out, and more important, their interest in providing services in a timely and accurate manner. Efforts will continue to make the condition of the OPF useful for purposes of legal and career considerations. Hopefully, our ability to generate a computer produced biographic profile (limited edition initially) and the clear text readout of employee qualifications promised by Project CENQUAL will be possible in the not too distant future and enable faster and more complete responses to customer requests and needs.

STATINTL